

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION**

DONTE BELL,

Plaintiff,

v.

NATIONAL CREDIT SYSTEMS, INC.;  
ASSURANT, INC. (a/k/a SURE DEPOSIT);  
EQUIFAX INFORMATION SERVICES,  
LLC; EXPERIAN INFORMATION  
SOLUTIONS, INC.; and TRANSUNION,  
LLC,

Defendants.

Case No.: 2:19-CV-01727-BAT  
Hon. Judge Brian A. Tsuchida

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**DEFENDANT NATIONAL CREDIT SYSTEMS, INC.’S  
RESPONSE TO PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO FILE  
ATTORNEYS’ FEE AFFIDAVIT AT ECF 88**

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Defendant National Credit Systems, Inc., (“Defendant”), through its undersigned counsel, hereby advises the Court that it does not oppose Plaintiff’s Motion for Leave to File her Attorney Fee Affidavit, though it does notify this Honorable Court, as it likely is already aware, that it does have Objections to the Report and Recommendation filed at ECF 87, which it lodged at ECF 89. National Credit Systems, Inc., does also note that, though it does not appear to be required in this district, the Plaintiff did not seek concurrence prior to filing her motion, but that the lack of communication from the Plaintiff in this matter – both in response to requests regarding deficiencies in their allegations (*see generally* ECF 82, 84, 89), as well as misrepresentations regarding conferral (*see* ECF 57), has happened before. National Credit Systems, Inc., also wishes to advise the Court that, had Plaintiff’s counsel conferred with undersigned counsel prior to filing the Motion to Extend that is the subject of this Response, the Motion and subsequent Response likely would not have been necessary.

Dated: November 6, 2020

Respectfully Submitted,

/s/ Katrina M. DeMarte

Katrina M. DeMarte (MI Bar No. P81476;  
CO Bar No. 43135)

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2020, I electronically mailed a copy of this document to Plaintiff's counsel of record.

/s/ Katrina M. DeMarte